

Ameresco Inc - Response to Diversity, Equity, and Inclusion Comment Request

To whom it may concern,

Below are our comments regarding diversity, equity, and inclusion.

4. Project workforce should be defined based on construction and installation activities. This is a defined group of activities that is specific to the project receiving REC contracts that occur over a set period of time. This work can be tracked and accounted for on a project by project basis and compliance can be ensured. Including sales, marketing, finance, etc would include labor for unsuccessful and successful projects over a period of time that does not correlate with project REC contracts and include activities for projects that may not lead to submission into the ABP program. It may also include time that is paired with activities outside of the realm of the ABP, which would lead to confusion over what should and should not be included in the workforce requirements.

6. Compliance with workforce requirements should be based around the date of the part II submission, not the initial REC contract as there will often be delay between the REC contract and construction. This also prevents projects from stretching over multiple year compliance reports and instead can be submitted in the year that the part II is submitted in.

7. Compliance should be based across all categories. This allows a vendor flexibility in a certain geographic location or financial constraints of a particular project limits equity participation, while still ensuring that overall participation is maintained. It also cuts back on the paperwork required from the approved vendor which must be reviewed by the program administrator.

Regards,
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